



Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137



January 6, 2021

**Federally-Enforceable District-Origin Operating Permit
(FEDOOP)
Statement of Basis**

Source: TransMontaigne Operating
Company, L.P. – Louisville
4510 Bells Lane
Louisville, KY 40211

Owner: TransMontaigne Operating GP L.L.C.
1617 Broadway, Suite 3100
Denver, CO 80202

Application Documents:	See Table I-8	Administratively Complete:	Oct. 09, 2020
Draft Permit:	Nov. 03, 2020	Proposed Permit:	Nov. 03, 2020
Permitting Engineer:	Shannon Hosey	Permit Number:	O-0222-20-F
Plant ID: 0222	SIC: 5171	NAICS: 42271	

Introduction:

This permit will be issued pursuant to District Regulation 2.17- Federally Enforceable District Origin Operating Permits. Its purpose is to limit the plant wide potential emission rates from this source to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.

This permit action is reclassifying the company from a minor source to a FEDOOP source, and is incorporating a construction permit authorizing conversion of tanks 3 and 4 to floating roof storage tanks.

Jefferson County is classified as an attainment area for lead (Pb), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter less than 10 microns (PM₁₀), and particulate matter less than 2.5 microns (PM_{2.5}). Jefferson County is classified as a nonattainment area for ozone (O₃).

Permit Application Type:

<input checked="" type="checkbox"/> Initial issuance	Permit Revision	<input type="checkbox"/> Permit renewal
	<input type="checkbox"/> Administrative	
	<input type="checkbox"/> Minor	
	<input type="checkbox"/> Significant	

Compliance Summary:

<input checked="" type="checkbox"/> Compliance certification signed	<input type="checkbox"/> Compliance schedule included
<input type="checkbox"/> Source is out of compliance	<input checked="" type="checkbox"/> Source is operating in compliance

I Source Information**1. Product Description:**

TransMontaigne owns and operates a bulk fuel distribution terminal.

2. Process Description:

TransMontaigne operates several storage tanks, truck loading rack, barge and railcar loading facility for petroleum and other liquid products.

3. Site Determination:

There are no other facilities that are contiguous or adjacent to this facility.

4. Emission Unit Summary:

Emission Unit	Equipment Description
U1	Storage Tanks
U2	Loading and Oil/Water Separator

5. Fugitive Sources:

There are fugitive VOC and HAP emissions from the transfer and handling of petroleum products.

6. Permit Revisions:

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
36442-13-O	NA	05/22/2013	Initial	Initial Permit Issuance
O-0222-20-F	11/03/2020	01/06/2021	Initial	Reclassifying from a Minor source to a FEDOOP and converting tanks 3 and 4 to floating roof storage tanks

7. Construction Permit History:

Permit No.	Effective Date	Description
C-0222-20-0016-F	01/06/2021	Converting Tanks 3 and 4 to floating roof storage tanks.

8. Application and Related Documents

Document Number	Date	Description
6690	06/26/2017	Application 100A to update tanks 1 and 8.
163237	08/13/2020	Construction/operating application 100A, to convert Tanks 3 and 4 to floating roof storage tanks.
171747	09/09/2020	FEDOOP Application 100A

9. Emission Summary

Pollutant	Potential Emissions (tpy)	Pollutant that triggered Major Source Status (based on PTE)
CO	-	No
NO _x	-	No
SO ₂	-	No
PM ₁₀	-	No
VOC	1820.11	Yes
Total HAPs	833.44	Yes
Single HAP > 1 tpy		
2,2,4-Trimethylpentane ¹	503.82	Yes
Xylene	181.98	Yes
Hexane	18.56	Yes
Toluene	55.05	Yes
Benzene	54.61	Yes
Ethylbenzene	18.42	Yes

10. Applicable Requirements

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> 40 CFR 60 | <input checked="" type="checkbox"/> SIP | <input checked="" type="checkbox"/> 40 CFR 63 |
| <input type="checkbox"/> 40 CFR 61 | <input checked="" type="checkbox"/> District Origin | <input type="checkbox"/> Other |

¹ This is also known as Iso Octane.

11. Referenced Federal Regulations:

40 CFR Part 60, subpart Kb – Standards of Performance for VOC Storage Vessels

40 CFR 60, subpart XX – Standards of Performance for Bulk Gasoline Terminals

40 CFR 63, subpart BBBBBB – National Emission Standards for Hazardous Air Pollutants for Source Category: Bulk Gasoline Terminals (Area Sources)

12. Non-Applicable Regulations:²

40 CFR Part 63, Subpart R does not apply because the emission screening factor for bulk gasoline terminals (E^T) is less than 1.

II Regulatory Analysis**1. Stratospheric Ozone Protection Requirements:**

Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. TransMontaigne does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.

2. Basis of Regulation Applicability**a. Applicable Regulations**

Regulation	Title	Basis
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	Applies to each storage tank in being or commenced construction, modification, or reconstruction on or before April 19, 1972, <i>and</i> that has a storage capacity greater than 250 gallons <i>and</i> true vapor pressure of the VOCs as stored equal to or greater than 10.4 kPa (1.5 psia).
6.21	Standard of Performance for Existing Gasoline Loading Facilities At Bulk Terminals	Applies to bulk gasoline terminal for loading gasoline into tank trucks, trailers, railroad tank cars, or other mobile, non-marine vessels on or before June 13, 1979.
6.22	Standard of Performance for Existing Volatile	Applies to each loading facility which loads more than 200 gallons in any one day of volatile organic materials

² The source is exempt from the regulations or they are otherwise inapplicable.

Regulation	Title	Basis
	Organic Materials Loading Facilities	into tank trucks, trailers, or railroad tank cars that was commenced before September 1, 1976.
6.26	Standard of Performance for Existing Volatile Organic Compound Water Separators	Applies to any compartment of any vessel or device operated for the recovery of volatile organic compounds that contains 200 gallons a day or more of any VOCs from any equipment which processes, refines, stores, or handles hydrocarbons with a Reid vapor pressure of 0.5 psia or greater that was in being or commenced construction, modification, or reconstruction on or before April 19, 1972
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	Applies to each storage tank that commences construction, modification, or reconstruction after April 19, 1972, <i>and</i> has a storage capacity greater than 250 gallons <i>and</i> true vapor pressure of the VOCs as stored equal to or greater than 10.4 kPa (1.5 psia).
40 CFR Part 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	Applies to each storage tank with a capacity greater than or equal to 75 m ³ storing volatile organic liquids for which construction, reconstruction, or modification commences after July 23, 1984
40 CFR 60 Subpart XX	Standards of Performance for Bulk Gasoline Terminals	Applies to all the loading racks at a bulk gasoline terminal which deliver liquid product into gasoline tank truck. commencing construction or modification after December 17, 1980
40 CFR Part 63 Subpart BBBBBB	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk	Establishes requirements to demonstrate compliance with the emission limitations and management practices for applicable gasoline storage tanks.

Regulation	Title	Basis
	Plants, and Pipeline Facilities	

b. Plantwide

- i. TransMontaigne is potentially major for VOC, total HAP, and single HAPs hexane, toluene, benzene, xylene, ethylbenzene, and 2,2,4-Trimethylpentane. Regulation 2.17 – *Federally Enforceable District Origin Operating Permits* establishes requirements to limit the plant wide potential emission rates to below major source threshold levels and to provide methods of determining continued compliance with all applicable requirements.
- ii. Regulations 5.00 5.20, 5.21, and 5.23 (STAR Program) establish requirements for environmental acceptability of toxic air contaminants (TACs) and the requirement to comply with all applicable emission standards. TransMontaigne has requested emission limits of less than 25 tons per year for all criteria pollutants, less than 12.5 tons/year for total HAPs and less than 5 tons per year for each individual HAP to be considered exempt from local TAC (STAR) regulations, as defined by Regulation 5.00, section 1.13.5.
- iii. Regulation 2.17, section 5.2, requires monitoring and record keeping to assure ongoing compliance with the terms and conditions of the permit. The owner or operator shall maintain all the required records for a minimum of 5 years and make the records readily available to the district upon request.
- iv. Regulation 2.17, section 7.2, requires stationary sources for which a FEDOOP is issued to submit an Annual Compliance Certification by April 15, of the following calendar year. In addition, as required by Regulation 2.17, section 5.2, the source shall submit regular reports to show compliance with the permit. Compliance reports and compliance certifications shall be signed by a responsible official and shall include a certification statement per Regulation 2.1. The compliance reports are due within 60 days of the end of the reporting period:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 - June 30	August 29
July 1 - December 31	March 1 of the following year

c. Emission Unit U1 – Storage Tanks

EP	Description	Applicable Regulations
E1	Storage Tank #1, 148,055 Gallons, equipped with a Fixed Roof	6.13, 40 CFR Subpart BBBBBB
E2	Storage Tank #2, 223,230 Gallons, equipped with an Internal Floating Roof	
E3	Storage Tank #3, 737,730 Gallons equipped with Cone Roof and an Internal Floating Roof	7.12, 40 CFR Subpart Kb, 40 CFR Subpart BBBBBB
E4	Storage Tank #4, 394,800 Gallons, equipped with Cone Roof and an Internal Floating Roof	
E5	Storage Tank #5, 394,800 Gallons, equipped with Cone Roof	NA
E6	Storage Tank #6, 1,370,964 Gallons, equipped with an Internal Floating Roof	6.13, 40 CFR Subpart Kb, 40 CFR Subpart BBBBBB
E7	Storage Tank #7, 707,448 Gallons, equipped with an Internal Floating Roof	
E8	Storage Tank #8, 1,802,514 Gallons, equipped with an Internal Floating Roof with Dome	
E9	Storage Tank #9, 19,992 Gallons, equipped with Horizontal Fixed Roof	NA
E10	Storage Tank #10, 11,970 Gallons, equipped with Horizontal Fixed Roof	NA
E11	Storage Tank #11, 19,992 Gallons, equipped with Horizontal Fixed Roof	NA
E12	Storage Tank #12, 1,798,692 Gallon equipped with Cone Roof	7.12, 40 CFR Subpart Kb

i. Standards**(1) HAP**

40 CFR 63 Subpart BBBBBB establishes operational requirements and limitations to assure ongoing compliance to operate the loading rack. Subpart BBBBBB cites conditions from 40 CFR 63 Subpart A.

(2) VOC

(a) Regulation 6.13 and 7.12, establishes the requirements to install, maintain, and operate the applicable storage tanks.

(b) 40 CFR 60 Subpart Kb establishes the requirements to install, maintain, and operate the applicable storage tanks.

ii. Monitoring and Record Keeping**(1) HAP**

40 CFR 63 Subpart BBBBBB establishes monitoring and record keeping requirements for gasoline bulk terminals.

(2) VOC

40 CFR Part 60, Subpart Kb establishes monitoring requirements for storage vessels.

iii. Reporting**HAP**

As required by 40 CFR 63 Subpart BBBBBB, the source shall submit regular reports to show compliance with the permit. The compliance reports are due within 30 days of the end of the reporting period.

d. Emission Unit U2 – Loading and Oil/Water Separator

EP	Description	Applicable Regulations
E13	2-Bay Truck Loading Rack	6.21, 6.22, 40 CFR Subpart XX, 40 CFR Subpart BBBBBB
E14	Pad Loading Rack	
E15	Barge Loading	
E16	Railcar Loading	
E17	6,000 gallon oil water separator to control run-off from truck loading rack operations	6.26

i. Standards**(1) HAP**

40 CFR 63 Subpart BBBBBB establishes operational requirements and limitations to assure ongoing compliance to operate the loading rack. Subpart BBBBBB cites conditions from 40 CFR 63 Subpart A.

(2) VOC

(a) Regulation 6.21 establishes operational requirements and limitations to assure ongoing compliance to operate the loading rack.

(b) Per Regulation 6.22, the source shall not load any volatile organic materials into any tank, truck, trailer,

or railroad car from the loading facility unless such loading is accomplished by submerged fill, bottom loading, or equivalent methods. To avoid control requirements prescribed by Regulation 6.22, the source shall not load 20,000 gallons or more in any one day.

- (c) Regulation 6.26 establishes operational requirements and limitations to assure ongoing compliance to operate the loading rack.
- (d) 40 CFR 60 Subpart XX establishes operational requirements and limitations to assure ongoing compliance to operate the loading rack.

ii. Monitoring and Record Keeping

HAP

40 CFR 63 Subpart BBBB establishes monitoring and record keeping requirements for gasoline bulk terminals.

iii. Reporting

HAP

As required by 40 CFR 63 Subpart BBBB, the source shall submit regular reports to show compliance with the permit. The compliance reports are due within 30 days of the end of the reporting period.

III Other Requirements

1. Temporary Sources:

The source did not request to operate any temporary facilities.

2. Short Term Activities:

The source did not report any short term activities.

3. Emissions Trading:

The source is not subject to emission trading.

4. Alternative Operating Scenarios:

The source did not request any alternative operating scenarios.

5. Compliance History:

There are no records of any violations of the terms of the present or prior construction or operating permits.

6. Calculation Methodology or Other Approved Method:

Emission Unit	Description	Emission Factor/Calculation Methodology
U1	Storage Tanks	AP-42 Section 7.1, which is the same set of formulas used in TANKs 4.0.
U2	Loading	VOC emissions based on AP-42, Section 5.2 Distillate HAP emissions based on factors extracted from Table 3-1 in API's publication Compilation of Air Emission Factors for Petroleum Distribution and Retail Marketing Facilities, Publication 1673, May 1998, after conversion from liquid HAP fraction to vapor HAP fraction. Aviation Gasoline HAP emissions based on HAP wt% from Aviation Gasoline MSDS. Operations at Bulk Gasoline Terminals, API Publication No. 347, Table 5-2, Pg. 5-3, October 1998

7. Insignificant Activities

Equipment	Qty	Regulation Basis
Pressurized VOC storage vessels – 18,000 gallon propane tank and 30,000 gallon butane tank	2	Regulation 1.02, Appendix A, 3.26

- Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16, section 3.5.4.1.4.
- Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements as required by Regulation 2.16, section 4.1.9.4.
- The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- The owner or operator shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16, section 4.3.5.3.6.

6. The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) to be reported on the annual emission inventory.
7. The District has determined pursuant to Regulation 2.16, section 4.1.9.4 that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) Basis of Regulation Applicability for IA units